

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO.: 1:18 CR 212
)	
)	
Plaintiff,)	JUDGE GAUGHAN
)	
vs.)	
)	
FABIAN MIHAJ.)	
)	
Defendant.)	

**UNOPPOSED MOTION TO CONTINUE TRIAL AND SCHEDULE MATTER FOR A
CHANGE OF PLEA HEARING**

Now comes the Defendant, by and through undersigned counsel, and respectfully requests that this Honorable Court set a change of plea hearing for a date outside the current trial date. The instant matter is currently set for trial on September 11, 2018. Negotiations between the government and the defense have resulted into a plea agreement which is currently being reduced to writing between the parties. Several dates were discussed prior to the trial date but the parties do not have mutual availability prior to the trial date.

WHEREFORE, counsel respectfully requests that this Honorable Court continue the trial date for the sole purpose of allowing the parties to coordinate a date with the court for a change of plea. This Motion is not being made for the purpose of delay.

Respectfully submitted,

/s/ Marcus S. Sidoti

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CETIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been forwarded to all pertinent parties via Clerk's Office electronic filing on this 27th day of August, 2018.

/s/ Marcus Sidoti

Marcus Sidoti, 0077476
Attorney for Defendant